

Message

From: Eric.Kroger@CH2M.com [Eric.Kroger@CH2M.com]
Sent: 10/29/2013 2:53:15 PM
To: Weissbart, Erich [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e361d2f1f04641e49ca63c81a2e2f4ee-EWeissba]; Prince, Ruth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5a11586323c64d109aac63da72d047dd-Rprinc02]
CC: cibrikje@dow.com; Jessica.Kastanek@ch2m.com
Subject: RE: s charleston middle mainland
Attachments: SCF_RTC_VIRAs.pdf

Thanks you Erich and Ruth. The two documents with unresolved risk assessment items related to the Middle Mainland are:

- **Vapor Intrusion Risk Assessment Report Addendum.** Submitted December 14, 2012; → *note that for Middle Mainland, we just need concurrence on the Building 323 conclusions. Other comment responses we have incorporated are not related to Middle Mainland, or would not affect the Remedial Approach. See the attached transmittal letter for reference.*
- **Screening-Level Human Health Risk Assessment for Surface Soil.** Submitted September 26, 2013. → *While not specific to Middle Mainland, the sitewide risk management approach proposed is applied to the Middle Mainland Remedial Approach Report.*

Let me know if there is anything else you need, or if a call would facilitate this process.

Thanks for your attention to this!

Eric

Office Phone: **513.847.4487**

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From: Weissbart, Erich [mailto:Weissbart.Erich@epa.gov]

Sent: Tuesday, October 29, 2013 9:54 AM

To: cibrikje@dow.com; Kroger, Eric/DAY

Subject: FW: s charleston middle mainland

Jerome,

I pulled out the email I sent in August and spoke to Ruth. Can you confirm the titles of the two risk assessment reports (Vapor Intrusion Risk Assessment Report Addendum is apparently one of them) and the fact that you would like Ruth to review the titles prior to something for Institute, which is her priority now. Also, please include Ruth in the email as she is expecting it.

Erich Weissbart, P.G.

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weissbart.erich@epa.gov

From: Weissbart, Erich

Sent: Monday, August 12, 2013 6:55 AM

To: 'Cibrik, Jerome (JE)'

Cc: pizarro, luis

Subject: RE: s charelston middle mainland

Unfortunately EPA's approval of the proposed remedy for Middle Mainland S. Charleston hinges on acceptance of Risk documents that has not yet been completed. The Vapor Intrusion and HHRA reports are still pending as Ruth has not reviewed the Response to Comments yet. I have completed my review of the Middle Mainland Remedy as has WV but Ruth has quite a backlog of other work. I'm sorry that this isn't exactly what you are looking for but any remedy based on risk has to have the concurrence of the Risk Assessor.

Erich Weissbart, P.G.

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From: Cibrik, Jerome (JE) [<mailto:cibrikje@dow.com>]

Sent: Wednesday, August 07, 2013 4:03 PM

To: Weissbart, Erich

Subject: RE: s charelston middle mainland

Erich,

First, thanks for the e-mail in lieu of preparing formal comments.

The proposed remedy for the Middle Mainland Remediation Area (Middle Mainland) remedy is consistent the remedial action objectives for the South Charleston Facility, the presentation to WVDEP on Monday regarding the WV Groundwater Protection Act, as well as the other RCRA facilities in UCC's West Virginia portfolio. The following outlines how the Middle Mainland remedy is consistent with the WV Groundwater Protection Act as presented on Monday:

- The RAOs presented in Slide 15 have been met for Middle Mainland:
 - o Middle Mainland has no unacceptable groundwater discharge to the Kanawha River, as confirmed through two rounds of pore water sampling.
 - o There are no unacceptable vapor intrusion risks, as confirmed through subslab gas and indoor air sampling of occupied buildings.
 - o Any direct contact risks to soil and groundwater are being mitigated by controls in place at the facility (e.g., excavation notifications, PPE requirements, maintaining a cover over surface soil, etc.). An Environmental Covenant will be used to maintain these controls in the future.
- Slide 25 of the presentation indicates that active remediation will be conducted where there is risk (i.e., via discharge to the Kanawha River or vapor intrusion) and the areas are accessible. For Middle Mainland, there is no unacceptable risk, so active remediation is not necessary.
- Slide 26 of the presentation indicates that long term monitoring (LTM) will be used to evaluate groundwater quality to demonstrate that plumes area stable or decreasing over time and show that risks to human health and the environment are mitigated. The proposed Middle Mainland remedy includes LTM to monitor groundwater concentration trends and confirm that the RAOs are achieved over time. Note that MNA as defined in USEPA Directive 9200.4-17P is not a component of our remedy. The facility RAOs have been met, and the LTM program will meet the intent of the WV Groundwater Protection Act.

I believe that answering this question specifically for Middle Mainland will also address the similar question in your e-mail to Eric Kroger on Tuesday. It also was my understanding at the meeting in Philadelphia that you were in agreement with the remedy for Middle Mainland and would be submitting an approval letter in the near future.

I would be more than happy to discuss this further if you desire. Please give me a call at 304-747-7788 if you would like to discuss or let me know if you want me to set up a conference call..

Thanks,
Jerome

From: Weissbart, Erich [<mailto:Weissbart.Erich@epa.gov>]

Sent: Wednesday, August 07, 2013 8:53 AM

To: Cibrik, Jerome (JE)

Subject: s charelston middle mainland

Jerome,

Before I generate comments on the Middle Mainland Remediation Area Remedial Approach can you and your team tell me how the selected remedy conforms with the presentation on Monday morning? My understanding from the meeting with WV was that 1) risk to the river would drive any remediation; 2) once risk was met, then MNA would be implemented until groundwater was restored to drinking water. The remedy for Middle Mainland as presented is long-term monitoring and ICs. How will this proposed remedy remediate groundwater towards drinking water standards without source control or demonstrated biodegradation, which is what MNA is.

I recognize that my understanding from the meeting may be different than yours? I welcome a call if necessary.

Erich Weissbart, P.G.

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